

Morgan Lewis **MEMO ENDORSED.**

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February 23, 2023

VIA ECF

Hon. Ona T. Wang
United States Magistrate Judge
United States District Court for the
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 20D
New York, NY 10007-1312

Application **GRANTED**. Defendant's time to respond to the Complaint is extended to March 31, 2023.

The Initial Case Management Conference previously scheduled for March 15, 2023 is hereby adjourned to **Tuesday, May 2, 2023 at 11:00 a.m.**

SO ORDERED.



Ona T. Wang 2/24/23
U.S.M.J.

Re: *Velazquez v. Ballard Designs, Inc.*, Case No. 1:22-cv-09225-JHR-OTW
Request to Extend Time to Respond to the Complaint and Adjourn Conference

Dear Judge Wang:

We represent defendant Ballard Designs, Inc. ("Ballard") in the above-referenced action. Pursuant to Your Honor's Individual Practices in Civil Cases, we write with the consent of counsel for Plaintiff Bryan Velazquez ("Plaintiff") respectfully to request that the Court (a) extend Ballard's time to respond to the Complaint from March 1, 2023 to March 31, 2023, and (b) adjourn the initial conference scheduled for March 15, 2023 at 11 a.m. to a date and time at least two weeks after the extended-to response deadline that is convenient to the Court. This Ballard's second request for an extension of time to respond to the Complaint and first request to adjourn the initial conference. The Court granted Ballard's prior extension request. In support of this request, counsel for Ballard states that the parties are engaged in discussions about a potential early resolution of this case. If granted, this extension and adjournment will permit the parties to focus on those efforts, rather than on pleadings and preparing for the conference. As noted above, Plaintiff's counsel consents to these requests.

We thank the Court in advance for its consideration of these requests.

Respectfully submitted,

/s/ Michael F. Fleming

Michael F. Fleming
Attorney for Defendant Ballard Designs, Inc.

C: All Counsel of Record (via ECF)

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